

The Honorable Robert S. Lasnik

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHASE FRIEDRICH,

Defendant.

NO. CR20-110 RSL

PROTECTIVE ORDER

Upon the unopposed motion of the United States, and the Court being advised as to the nature of this case, it is hereby ORDERED:

The Government will make available copies of materials that include Protected Material identified below to defense counsel to comply with the Government's discovery obligations. IT IS ORDERED that pursuant to Rule 16(d)(1), Federal Rules of Criminal Procedure, counsel of record for DEFENDANT shall not provide DEFENDANT or any other person outside the defense team (i.e., attorneys of record, investigators, paralegals, law clerks, experts and assistants for the attorneys of record) with copies of any discovery material produced by the government that has been designated as "Protected Material" which contains:

(a) personal, financial, or sensitive information relating to the victim ("Victim Information");

(b) personal identifying information of any individual, including without limitation, any individual's date of birth, social security number, current address, telephone number, email address, driver's license number, professional license number, or family members' names ("Personal Information") unless it belongs to the individual defendant; or

(c) financial information of any individual (other than the defendant) or business, including without limitation, bank account numbers, credit or debit card numbers, account passwords, account names and contact information, account history, account balances, account statements, or taxpayer identification numbers ("Financial Information") unless it belongs to the defendant.


Notwithstanding the foregoing, defense counsel may provide a copy of the discovery to defendant if the defense team first redacts the material described above from the discovery material. The defense team may display and review discovery that has been designated as Protected Material with the Defendant, and the defense agrees that the Defendant shall not duplicate protected information and any notes taken shall remain in counsel's office.

IT IS FURTHER ORDERED that, subject to the restrictions above, neither defense counsel nor defendant shall provide any material that the government has designated as Protected Material to any person outside of the defense team without the government's express written permission, except that defense counsel may provide discovery material to those persons who are necessary to assist counsel of record in preparation for trial or other proceedings and who agree to be bound by the terms of this Protective Order.

IT IS FURTHER ORDERED that the United States Attorney's Office for the Western District of Washington is allowed to display and review the Protected Material to lay witnesses, but is otherwise prohibited from providing copies of the Protected Material to lay witnesses, *i.e.*, non-law enforcement witnesses, except as those lay

1 witnesses are necessary to assist in the preparation for trial or other proceedings and
2 agree to be bound by the terms of this Protective Order.

3 DATED this 23rd day of September, 2020.
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7 Robert S. Lasnik
8 United States District Judge
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11 Presented by:

12 /s/ Lyndsie R. Schmalz
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14 LYNDIE R. SCHMALZ

15 Assistant United States Attorney
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